

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

YOGEV SHAT, on behalf of himself and all others similarly situated,

Plaintiffs,

V.

SUPREME GARAGE DOOR, LLC and
RON DAHARI

Defendants.

Case No. 3:24-cv-02202

**UNOPPOSED MOTION BY DEFENDANTS SUPREME GARAGE DOOR, LLC
AND RON DAHARI TO EXTEND THE DEADLINE TO ANSWER
OR RESPOND TO PLAINTIFFS' ORIGINAL VERIFIED COLLECTION
ACTION OR, ALTERNATIVELY, CLASS ACTION COMPLAINT**

Defendants Supreme Garage Door, LLC and Ron Dahari (together, “Defendants”) hereby file this Unopposed Motion to Extend the Deadline to Answer or Respond to Plaintiffs’ Original Verified Complaint Collective Action or, Alternatively, Class Action Complaint (the “Motion”), and would show the Court as follows:

1. Plaintiffs Yogev Shat, on behalf of himself and all other similarly situated (together, “Plaintiffs”) filed their Original Verified Complaint Collective Action or, Alternatively, Class Action Complaint (the “Complaint”) on August 27, 2024, in which they have pled four claims against Defendants for: (i) violation of the Fair Labor Standards Act (“FLSA”); (ii) alternatively, declaratory judgment; (iii) alternatively breach of contract; and (iv) negligence.
2. The Complaint was served on Defendants on August 28, 2024.
3. Defendants’ deadline to serve and answer or response to the Complaint is currently September 18, 2024.

4. Defendants formally retained the undersigned as their legal counsel in this matter on September 12, 2024.

5. Defendants now respectfully request that the Court extend the deadline for them to answer or respond to the Complaint up to, and including, October 18, 2024. This additional time will permit Defendants and their recently retained legal counsel to properly and efficiently evaluate the factual allegations and legal claims made in the Complaint, competently prepare an answer or other response, and to consider the possibility of early settlement. Such an extension is also warranted given the potential complexity of the issues raised by Plaintiff's FLSA, declaratory judgment, and breach of contract claims.

6. This Motion is filed in good faith for the purpose of enabling Defendants' attorneys to properly respond to the complaint, is not intended for purposes of delay, and will not cause any prejudice.

7. Plaintiffs do not oppose the relief requested.

8. For the reasons set forth above, Defendants respectfully request that the Court grant this Motion, extend the Defendants' deadline to answer or otherwise respond to the Complaint up to and including October 18, 2024, and grant any and all other relief, at law or in equity, to which the parties have shown themselves justly entitled.

Dated: September 13, 2024.

Respectfully submitted,

/s/Kenneth N. Hickox, Jr.

Kenneth N. Hickox, Jr.

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**ATTORNEYS DEFENDANTS SUPREME
GARAGE DOOR, LLC and RON DAHARI**

CERTIFICATE OF SERVICE

I hereby certify that all current counsel of record have been served with a copy of the foregoing document via the Court's CM/ECF system in accordance with Local Civil Rule 5.1 on this 13th day of September, 2024.

/s/ Kenneth N. Hickox, Jr.

Kenneth N. Hickox, Jr.

CERTIFICATE OF CONFERENCE

I hereby certify that I personally conferred with Plaintiffs' counsel Michael Steinmark regarding the substance of this motion, and he indicated that Plaintiffs are unopposed to the relief requested.

/s/ Kenneth N. Hickox, Jr.

Kenneth N. Hickox, Jr.